

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KEVIN DAVITT, SCOTT CARTER and
MARK TUDYK individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

AMERICAN HONDA MOTOR CO.,
INC.,

Defendant.

No. 2:13-cv-00381-FSH-PS

CLASS ACTION

JURY TRIAL DEMANDED

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF THE CLASS ACTION SETTLEMENT**

For the reasons set forth in the accompanying Memorandum of Law submitted herewith, Plaintiffs respectfully request that this Court enter an Order: (1) conditionally certifying a class action with respect to the claims against Defendant pursuant to FED. R. CIV. P. 23(a) and 23(b)(3) for the purpose of effectuating a class action settlement of the claims against Defendant; (2) preliminarily approving the settlement; (3) directing Notice to Settlement Class Members consistent with the Notice Plan in the Settlement Agreement; (4) appointing Chimicles & Tikellis as Class Counsel; and (5) scheduling a final approval hearing.

Dated: September 24, 2014

Respectfully submitted,

By: //s// Matthew D. Schelkopf
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Proposed Settlement Class***